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### REMARKS

The present response is intended to be fully responsive to all points of objection and/or rejection raised by the Examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance of the application is respectfully requested.

Applicants assert that the present invention is new, non-obvious and useful. Prompt consideration and allowance of the claims is respectfully requested.

### Status of Claims

Claims 1-44 are pending in the application. Claims 1-44 have been rejected.

### CLAIM REJECTIONS

#### 35 U.S.C. § 102 Rejections

In the Office Action, the Examiner rejected claims 1,12,23,24,26,27,34,35,37 and 38 under 35 U.S.C. § 102(b), as allegedly being anticipated by Sauer et al. (U.S. #5,973,311). Applicant respectfully traverses the Examiner's rejection in view of the remarks that follow.

Applicant respectfully asserts that Sauer et al. do not teach nor even fairly suggest "plurality of direct injection unit cells" recited in independent claims 1, 12, 23 and 34. Applicant respectfully assert that Sauer et al. does not teach nor does it even fairly suggest the direct injection unit cells or pixels as recited in claims 1, 12, 23 and 34. Moreover, Applicant respectfully requests the Examiner to point out where exactly in Sauer et al. specification and drawings does Sauer et al. disclose or teach a direct injection unit cell or pixel.

In view of the above remarks, Applicant respectfully asserts that independent claims 1, 12, 23, and 34 are allowable over Sauer et al. Claims 24, 26, 27 depend from, directly or indirectly, claim 34 and therefore include all the limitations of this claim and are also allowable. Claims 35, 37 and 38 depend from, directly or indirectly, claim 34 and therefore include all the limitations of this claim and are also allowable.

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Accordingly, Applicant respectfully requests that the Examiner withdraw the rejections under 35 U.S.C. § 102(b) to independent claims 1 and to independent 23 and to claims 24, 26, 27, dependent thereon.

Similarly, for the same reasons indicated hereinabove, Sauer et al. cannot anticipate claims 12 and 34. Applicant respectfully requests that the Examiner withdraw the rejections under 35 U.S.C. § 102(b) to independent claim 12 and to independent 34 and to claims 35, 37 and 38 dependent thereon.

Applicants respectfully request reconsideration and withdrawal of the rejections of claims 1, 12, 23, 24, 26, 27, 34, 35, 37 and 38.

### **35 U.S.C. § 103 Rejections**

In the Office Action, the Examiner rejected claims 2,4,5,13,15 and 16 under 35 U.S.C. § 103(a), as being unpatentable over Sauer et al. in view of Kokie et al. (US #4,212,034)

Applicants respectfully traverse the rejection of claims 2,4,5,13,15 and 16 as being unpatentable over Sauer et al. in view of Kokie et al. (US #4,212,034) because a prima facie case of obviousness has not been established.

In order to establish a showing of prima facie obviousness, the Examiner must show that all the elements of the claimed invention are taught by the cited references and that there would have been motivation to combine them to form the claimed invention. The combination of Sauer et.al. and Kokie et al., does not teach or even fairly suggest all the limitations of independent claim 1 or of amended independent claim 12, nor does it teach or suggest all the limitations of dependent claims 2,4,5 and 13,15,16 depending, respectively, thereon. Sauer et al. has been discussed above. That discussion is applicable here. Applicant respectfully asserts that since the Sauer et al. circuit does not teach “plurality of direct injection unit cells” as recited in independent claims 1 12, 23, and 34, the man skilled in the art would not have been motivated to combine Kokie et al. with Sauer et al., as there would be no motivation to combine the circuits taught by Kokie et al with the source follower circuits of Sauer et al. which teaches away from charge summing (by using voltage averaging and not charge summing). Accordingly, Applicants respectfully assert that this rejection is now moot and should be withdrawn.

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In the Office Action, the Examiner rejected claims 3 and 14 under 35 U.S.C. § 103(a), as being unpatentable over Sauer et al. and Kokie et al. and further in view of Pain et al. (US #8,801,258).

Applicants respectfully traverse the rejection of claims 3 and 14 under 35 U.S.C. § 103(a), as being unpatentable over Sauer et al. and Kokie et al. and further in view of Pain et al. (US #8,801,258), because a prima facie case of obviousness has not been established.

In order to establish a showing of prima facie obviousness, the Examiner must show that all the elements of the claimed invention are taught by the cited references and that there would have been motivation to combine them to form the claimed invention. The combination of Sauer et al., Kokie et al., and Pain et al. does not teach or even fairly suggest all the limitations of independent claim 1 or of claim 12, nor does it teach or suggest all the limitations of dependent claims 3 and 14 depending, respectively, thereon. Sauer et al. and Kokie et al. have been discussed above. That discussion is applicable here. Applicant respectfully asserts that since the Sauer et al. circuit does not teach nor even fairly suggest the “plurality of direct injection unit cells” as recited in independent claims 1, 12, 23, and 34, the man skilled in the art would not have been motivated to combine Kokie et al. and Pain et al. with Sauer et al., as there would be no motivation to combine the circuits taught by Kokie et al. and Pain et al. with the circuit of Sauer et al. Accordingly, Applicants respectfully assert that this rejection is now moot and should be withdrawn.

In the Office Action, the Examiner rejected claims 6, 7, 17, 18 under 35 U.S.C. § 103(a), as being unpatentable over Sauer et al., Kokie et al., Pain et al., and further in view of Nishida et al. (US#4,996,600).

Applicants respectfully traverse the rejection of claims 6, 7, 17, 18 under 35 U.S.C. § 103(a), as being unpatentable over Sauer et al., Kokie et al., Pain et al. and further in view of Nishida et al. (US#4,996,600), because a prima facie case of obviousness has not been established.

In order to establish a showing of prima facie obviousness, the Examiner must show that all the elements of the claimed invention are taught by the cited references and that there would have been motivation to combine them to form the claimed invention.

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The combination of Sauer et.al., Kokie et al., Pain et al. and Nishida et al. does not teach or even fairly suggest all the limitations of independent claim 1 or of amended independent claim 12, nor does it teach or suggest all the limitations of dependent claims 6,7 and 17,18 depending, respectively, thereon. Sauer et al., Kokie et al. and Pain et al. have been discussed above. That discussion is applicable here.

The combination of Sauer et.al., Kokie et al., and Pain et al. and Nishida et al. does not teach or even fairly suggest all the limitations of independent claim 1 or of amended independent claim 12, nor does it teach or suggest all the limitations of dependent claims 3 and 14 depending, respectively, thereon. Sauer et.al., Kokie et al., and Pain et al. have been discussed above. That discussion is applicable here. Applicant respectfully asserts that since the Sauer et al. circuit does not teach or even fairly suggests the “plurality of direct injection unit cells” as recited in amended independent claims 1 12, 23, and 34, the man skilled in the art would not have been motivated to combine Nishida et al, Kokie et al. and Pain et al. with Sauer et al., as there would be no motivation to combine the circuits taught by Nishida et al., Kokie et al. and Pain et al. with the circuit of Sauer et al. Accordingly, Applicants respectfully assert that the Examiner also failed to show a motivation to combine the above references to form the invention as claimed. Accordingly, Applicants respectfully assert that this rejection is now moot and should be withdrawn.

In the Office Action, the Examiner rejected claims 8-11, 19-22 under 35 U.S.C. § 103(a), as being unpatentable over Sauer et al. and Kokie et al. and further in view of Nishida et al.(US#4,996,600).

Applicants respectfully traverse the rejection of claims 8-11, 19-22 under 35 U.S.C. § 103(a), as being unpatentable over Sauer et al. and Kokie et al. and further in view of Nishida et al.(US#4,996,600), because a prima facie case of obviousness has not been established.

In order to establish a showing of prima facie obviousness, the Examiner must show that all the elements of the claimed invention are taught by the cited references and that there would have been motivation to combine them to form the claimed invention.

The combination of Sauer et.al., and Kokie et al., and Nishida et al. does not teach or even fairly suggest all the limitations of independent claim 12, nor does it teach or suggest all

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the limitations of dependent claims 8-11, 19-22 depending, respectively, thereon. Sauer et al., and Kokie et al have been discussed above. That discussion is applicable here.

The combination of Sauer et.al., Kokie et al. and Nishida et al. does not teach or even fairly suggest all the limitations of amended independent claim 1 or of amended independent claim 12, nor does it teach or suggest all the limitations of dependent claims 8-11 and 19-22 depending, respectively, thereon. Sauer et.al., Kokie et al., and Pain et al. have been discussed above. That discussion is applicable here. Applicant respectfully asserts that since the Sauer et al. circuit does not teach or even fairly suggests the "plurality of direct injection unit cells" as recited in independent claims 1, 12, 23, and 34, the man skilled in the art would not have been motivated to combine Nishida et al, Kokie et al. and Pain et al. with Sauer et al., as there would be no motivation to combine the circuits taught by Nishida et al., Kokie et al. and Pain et al. with the circuit of Sauer et al. Accordingly, Applicants respectfully assert that the Examiner also failed to show a motivation to combine the above references to form the invention as claimed. Accordingly, Applicants respectfully assert that this rejection is now moot and should be withdrawn.

In the Office Action, the Examiner rejected claims 25, 36 under 35 U.S.C. § 103(a), as being unpatentable over Sauer et al. in view of Pain et al.

Applicants respectfully traverse the rejection of claims 25, 36 under 35 U.S.C. § 103(a), as being unpatentable over Sauer et al. in view of Pain et al., because a prima facie case of obviousness has not been established.

In order to establish a showing of prima facie obviousness, the Examiner must show that all the elements of the claimed invention are taught by the cited references and that there would have been motivation to combine them to form the claimed invention.

The combination of Sauer et.al., and Pain et al., does not teach or even fairly suggest all the limitations of amended independent claim 23, and 34 nor does it teach or suggest all the limitations of dependent claims 26 and 36 depending, respectively, thereon. Sauer et al. has been discussed above. That discussion is applicable here.

Applicant respectfully asserts that since the Sauer et al. circuit does not teach or even fairly suggest the "plurality of direct injection unit cells" as recited in amended independent

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claims 23, and 34, the man skilled in the art would not have been motivated to combine Pain et al. with Sauer et al., as there would be no motivation to combine the circuits taught by Pain et al. with the circuit of Sauer et al. Accordingly, Applicant respectfully assert that the Examiner also failed to show a motivation to combine the above references to form the invention as claimed. Accordingly, Applicant respectfully asserts that this rejection is now moot and should be withdrawn.

In the Office Action, the Examiner rejected claims 28, 29, 39, 40 under 35 U.S.C. § 103(a), as being unpatentable over Sauer et al. and Pain et al., and further in view of Nishida et al.

Applicants respectfully traverse the rejection of claims 28, 29, 39, 40 under 35 U.S.C. § 103(a), as being unpatentable over Sauer et al. and pain et al., and further in view of Nishida et al. because a prima facie case of obviousness has not been established.

In order to establish a showing of prima facie obviousness, the Examiner must show that all the elements of the claimed invention are taught by the cited references and that there would have been motivation to combine them to form the claimed invention.

The combination of Sauer et.al., Pain et al., and Nishida does not teach or even fairly suggest all the limitations of amended independent claim 23, and 34 nor does it teach or suggest all the limitations of dependent claims 28-29 and 39-40 depending, respectively, thereon. Sauer et al. and Pain et al. have been discussed above. That discussion is applicable here.

Applicant respectfully asserts that since the Sauer et al. circuit does not teach or even fairly suggest the “plurality of direct injection unit cells” as recited in amended independent claims 23, and 34, the man skilled in the art would not have been motivated to combine Pain et al. and Nishida et al. with Sauer et al., as there would be no motivation to combine the circuits taught by Pain et al. and Nishida et al. with the circuit of Sauer et al. Accordingly, Applicants respectfully assert that the Examiner also failed to show a motivation to combine the above references to form the invention as claimed. Accordingly, Applicants respectfully assert that this rejection is now moot and should be withdrawn.

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In the Office Action, the Examiner rejected claims 30-33, 41-44 under 35 U.S.C. § 103(a), as being unpatentable over Sauer et al. in view of Nishida et al.

Applicants respectfully traverse the rejection of claims 30-33, 41-44 under 35 U.S.C. § 103(a), as being unpatentable over Sauer et al. in view of Nishida et al. because a prima facie case of obviousness has not been established.

In order to establish a showing of prima facie obviousness, the Examiner must show that all the elements of the claimed invention are taught by the cited references and that there would have been motivation to combine them to form the claimed invention.

The combination of Sauer et.al., and Nishida does not teach or even fairly suggest all the limitations of amended independent claim 23, and 34 nor does it teach or suggest all the limitations of dependent claims 30-33 and 41-44 depending, respectively, thereon. Sauer et al. has been discussed above. That discussion is applicable here.

Applicant respectfully asserts that since the Sauer et al. circuit does not teach or even fairly suggest the "plurality of direct injection unit cells" as recited in independent claims 23, and 34, the man skilled in the art would not have been motivated to combine Nishida et al. with Sauer et al., as there would be no motivation to combine the circuits taught Nishida et al. with the circuit of Sauer et al. Accordingly, Applicants respectfully assert that the Examiner also failed to show a motivation to combine the above references to form the invention as claimed. Accordingly, Applicants respectfully assert that this rejection is now moot and should be withdrawn.

In view of the foregoing amendments and remarks, all pending claims, claims 1-44 are deemed to be allowable. Their favorable reconsideration and allowance is respectfully requested.

Should the Examiner have any question or comment as to the form, content or entry of this Amendment, the Examiner is requested to contact the undersigned at the telephone number below. Similarly, if there are any further issues yet to be resolved to advance the prosecution of this application to issue, the Examiner is requested to telephone the undersigned counsel.

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**Petition For Three-Month Extension Of Time Under 37 CFR 1.136(a)**

The period for responding to the instant Office Action was set to expire on October 13, 2005. Applicant hereby requests that the period for responding to the instant Office Action be extended by three (3) months, so as to expire on January 13, 2006. Accordingly, this response is being timely filed.

**Payment Authorization**

The fee for a Petition for a Three-Month Extension of Time is One Thousand and Twenty Dollars (\$1,020.00) dollars for a large entity. No additional fees are believed due. The United States Patent and Trademark Office is hereby authorized to charge Deposit Account 501380 in the amount of One Thousand and Twenty Dollars (\$1,020.00) and any additional fee which is necessary in connection with this filing.

Favorable action is courteously solicited.

Respectfully submitted,



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Dated: January 12, 2006

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